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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

JUN 2

In the Matter of	
Implementation of the Telecommunications Act of 1996	CC Docket No. 96-115
Telecommunications Carriers' Use of Customer Proprietary Network Information and Other Customer Information	

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REPLY COMMENTS OF AT&T CORP.

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June 26, 1996

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SUMMARY

As AT&T shows in Part I, the comments confirm that the Commission's proposed interpretation of the services for which a telecommunications carrier may use CPNI without customer approval is too narrow, inconsistent with the statutory language and design, and thus would disserve consumers. Indeed, many commenters suggest that the Commission construe "telecommunications service" as used in Section 222(c)(1) to be a single service category encompassing all basic services as well as enhanced services and CPE that are "used in" or "necessary to" the provision of basic service. This would enable carriers to use CPNI to meet the full array of a customer's telecommunications needs and advance the Act's overriding objective of "opening all telecommunications markets to competition."[1] Consumers would reap the fruits of competition through increased choice, innovative new services, lower prices, and the convenience of "one-stop shopping," all without compromising their privacy interests.

Notwithstanding the substantial public interest benefits of this approach, AT&T recognizes that this all-encompassing interpretation could be at odds with the Act's definitions, as well as with its references to the need for carriers to obtain customer approval for the use of CPNI in

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[1] See S. Conf. Rep. No. 104-230, 104 Cong. 2d Sess. 1 (1996).

some circumstances. Accordingly, AT&T proposes that the Commission construe Section 222(c)(1) of the Act to allow carriers to use CPNI to develop and market, at a minimum, all of the carrier's basic transmission services without prior customer approval. As AT&T showed in its comments, this interpretation best comports with the Act's definition of "telecommunications service," the predictable blurring of past "product market" distinctions between local and long distance offerings as carriers enter new markets, and with legitimate customer expectations regarding the use of that information. In contrast, the narrow service distinctions proposed by the Commission would only undermine and delay the competitive promise of the Act by perpetuating "balkanized enclaves" of services, which would make carrier product development and marketing efforts more costly and less efficient, without advancing any apparent consumer privacy interests.

Although some parties contend that the Commission's proposed narrow construction of "telecommunications service" is necessary to protect consumer privacy, they have utterly failed to substantiate this assertion. Thus, the Commission should continue to adhere to its longstanding and unequivocal position that consumer privacy interests are not compromised by allowing broad use of customer information within an integrated firm. To the extent that safeguards may be necessary to guard against competitive abuses by the BOCs and GTE, the

Commission, of course, retains authority to continue the existing regulatory CPNI rules established under Computer II and Computer III for these dominant LECs which possess market power in their bottleneck monopoly services.

As shown in Part II, there is broad support among the commenters that the Commission should determine, consistent with consumer interests, the provisions of the Act, and its findings in Computer III, that customer "approval" to use CPNI for the development and marketing of non-telecommunications services can be inferred from the customer's informed participation in the customer-carrier relationship. Accordingly, the Commission should require that, before using CPNI for the marketing of non-telecommunications services, carriers provide a one-time notification to customers that would advise each customer of his or her CPNI rights, and give each customer an opportunity to withdraw consent for the use of CPNI for any purpose other than the provision of basic service. Such an approach would assure that customers know of their CPNI rights and can control a carrier's use of their CPNI, now or at any time in the future, without imposing inordinate costs on carriers.

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REPLY COMMENTS OF AT&T CORP.

Pursuant to the Commission's Notice of Proposed Rulemaking, FCC 96-221, released on May 17, 1996 ("Notice"), and Section 1.415 of the Commission's Rules, 47 C.F.R. § 1.415, AT&T Corp. ("AT&T") replies to other parties' comments[2] on the implementation of Section 702 of the Telecommunications Act of 1996,[3] which adds a new Section 222 to the Communications Act of 1934 regarding the use and protection of customer proprietary network information ("CPNI").[4]

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[2] A list of commenters and the abbreviations used to identify them is attached as Appendix A.

[3] Pub. L. No. 104-104, 110 Stat. 56 (1996), codified at 47 U.S.C. § 151, et seq. ("1996 Act").

[4] Under Section 222(f), CPNI is defined as "information that relates to the quantity, technical configuration, type, destination, and amount of use of a telecommunications service subscribed to by any customer of a telecommunications carrier, and that is made available to the carrier by the customer solely by virtue

(footnote continued on following page)

I. THE COMMISSION SHOULD CONSTRUE SECTION 222(c)(1) OF THE ACT TO ALLOW CARRIERS TO USE CPNI TO DEVELOP AND MARKET, AT A MINIMUM, ALL BASIC TELECOMMUNICATIONS SERVICES.

The comments confirm that consumer welfare will be maximized if the Commission construes the term "telecommunications service," as used in Section 222(c)(1) of the 1996 Act, broadly to allow carriers to use CPNI efficiently to develop and market new offerings that would provide solutions to customers' telecommunications needs. As Airtouch (at 3) explains:

> "a reasonably broad definition . . . is important because customers generally expect that their telecommunications carriers will be knowledgeable about their customers' telecommunications needs. Such knowledge is often based on CPNI. In fact, carriers need to use CPNI to appropriately and proactively provide their customers with information regarding new and innovative offerings that relate directly to services carriers are already providing to those customers. Anticipating customer needs and satisfying customer requirements are the hallmark of world class, highly competitive telecommunications carriers . . . ."

In this vein, as another party notes, the Commission's "[c]onstruction of Section 222 should be guided by existing market expectations and future public interest benefits. Both require that a company providing

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> of the carrier-customer relationship." As the Commission points out, "[a]bsent prior customer [approval], Section 222(c)(1) authorizes a telecommunications carrier to use individually identifiable CPNI obtained from the provision of a particular telecommunications service solely to provide 'the telecommunications service from which such information is derived,' or services necessary to provide that telecommunications service." Notice ¶ 20.

telecommunications service maximize its resources, including commercial business information, to bring innovative, quality products to market as solutions to customers' needs."[5] Consumer surveys cited by several commenters underscore that carriers will best be able to fulfill their customers' needs by a broad reading of "telecommunications service." For example, based on consumer responses, Bell Atlantic reports (at 7) that "[o]ne of the most important customer considerations in the coming years will be the ability of a telecommunications services provider to package various services and support all of a consumer's telecommunications needs."[6] Similarly, a study cited by CBT (at 4) shows that consumers "desire to purchase a variety of products from a single carrier, and often seek to obtain discounts by purchasing a package of products from an individual carrier."[7]

Moreover, both the Commission and the courts have repeatedly confirmed that customer welfare and beneficial competition are enhanced by encouraging and expanding suppliers' ability to use customer information to design and offer attractive new products. As the Commission has found, integrated marketing to consumers across service lines promotes efficiency and offers consumers direct benefits in

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[5] U S WEST at 2.

[6] Citing 1996 IDC/LINK Telecommunications Brand Equity Study at 1 (1996).

[7] Citing Aragon Consulting Group, study included as Appendix A to CBT's comments.

the form of "one-stop shopping" and the ability of the firm to offer additional service choices, including combinations of services, that may better serve the consumer's needs.[8] As the Commission has explained:

> "[t]he ability of a customer, especially a customer who has little or infrequent contact with service providers, to have one point of contact with a provider of multiple services is efficient and avoids the customer confusion that would result from having to contact various departments within an integrated, multi-service telecommunications company . . . to obtain information about the various services . . . ."[9]

The Commission has also recognized that restricting the use of CPNI within a firm "results in higher prices and reduced quality and variety of regulated services provided to ratepayers by carriers."[10]

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[8] Computer III Remand Proceedings: Bell Operating Company Safeguards and Tier 1 Local Exchange Company Safeguards, 6 FCC Rcd. 7571, 7610 (1991) ("Computer III Remand Order"). See also Motion of Southwestern Bell Mobile Systems, Inc. for a Declaratory Ruling that Section 22.903 and Other Sections of the Commission's Rules Permit the Cellular Affiliate of a Bell Operating Company to Provide Competitive Landline Local Exchange Service Outside the Region in which the Bell Operating Company is the Local Exchange Carrier, 11 FCC Rcd. 3386, 3395 (1995) ("this proposed integration of wireless and landline services offers substantial benefits to consumers by avoiding duplicative costs, increasing efficiency, and enhancing SBMS's ability to provide innovative service.")

[9] In re Applications of Craig O. McCaw and American Telephone and Telegraph Company, for Consent to the Transfer of Control of McCaw Cellular Communications, Inc. and its Subsidiaries, 10 FCC Rcd. 11786, 11795, 11799 (1995), affirmed sub. nom SBC Communications, Inc. v. FCC, 56 F.3d 1484 (D.C. Cir. 1995) (explicitly permitting AT&T to bundle long distance and cellular service).

[10] Furnishing of Customer Premises Equipment by the Bell Operating Telephone Companies and the Independent Telephone Companies, 2 FCC Rcd. 143, 147 (1987).

For these reasons, the Commission should allow the broadest use of CPNI within an integrated firm that is consistent with the language and purpose of the Act. As AT&T showed in its comments, the Act clearly would allow such use for all "basic" services, which most closely comports with the Act's own definition of "telecommunications service." In addition, Section 222(c)(1) also explicitly allows the use of CPNI for services "used in" or "necessary to" the provision of such service.[11] Thus, as a number of commenters suggest, the Commission could construe the category of offerings for which a carrier could use CPNI without prior customer approval as the full range of services and products (encompassing all basic services, as well as stand-alone enhanced services and CPE) that a carrier offers to its

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[11] AT&T at 6-7. Accordingly, AT&T urged the Commission to expressly permit the use of CPNI to assist in the development and marketing of at least those enhanced features that are "parts of" or "adjuncts to" basic services. The Commission should encourage carriers to continue to bring new features to their customers' attention, by recognizing that such features -- which are enhancements to basic service functionality -- are "used in" the provision of telecommunications service. See 47 U.S.C. § 222(c)(1). AT&T at 8 n.5. See also Ameritech at 5, 6; Bell Atlantic at 4; BellSouth at 7-9; NYNEX at 12; Pacific at 4; U S WEST at 5; GTE at 12 n.25; CBT at 3, 6. Consistent with its decision permitting the bundling of cellular service and cellular CPE, the Commission should explicitly allow the use of cellular CPNI for marketing of cellular CPE as the latter can be regarded as "necessary to" or "used in" the provision of service. See Ameritech at 5-6; Bell Atlantic at 4; NYNEX at 12; Pacific at 4; GTE at 12 n.25; CBT at 6.

customers as a telecommunications provider.[12] As one commenter observes, customer perception should guide the Commission's construction of the Act, and customers perceive associated enhanced services and equipment -- for example, the premises equipment for Caller ID, cellular phones, and voice mail -- to be optional parts of their telecommunications service.[13]

In all events, the term "telecommunications service" should include at least all "basic" services. As AT&T showed in its comments (at 6-7), this definition is the most reasonable interpretation of the Act and would allow carriers to use CPNI to market local, long distance, and wireless services, even if requiring them to obtain customer approval to use CPNI for those of a carrier's stand-alone enhanced services, CPE offerings and other nonregulated products that do not fall within the statutory definition.

As AT&T and other commenters demonstrate, enabling carriers to use CPNI efficiently and creatively to develop and market new "telecommunications service" offerings within this broad category also best comports with the new industry structure that the Act seeks to create.[14] Specifically, by

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[12] Ameritech at 3, 5-6; Bell Atlantic at 4-6; BellSouth at 3, 7-8; SBC at 7-8; U S WEST at 4-5, 8-9, 11, 15 ; GTE at 12 n.25; AT&T at 8 n.5.

[13] Bell Atlantic at 4-6.

[14] AT&T at 10-11; BellSouth at 5, 7-9; Pacific at 3 and NYNEX at 9 (if Commission adopts the proposed three service category approach, it must reexamine the definition of "telecommunications service" as technology evolves).

establishing the preconditions necessary to permit local competition to develop, and for the BOCs thereafter to enter the interexchange market, the Act clearly contemplates that telecommunications providers will offer integrated "packages" of telecommunications service and a single bill, and that consumers will become increasingly indifferent to -- and unaware of -- the actual distance a call travels. Such a blurring of past "product market" distinctions between local and long distance offerings is the logical and predictable consequence of the Act, and the Commission should construe the CPNI provisions consistent with this result. In contrast, the service distinctions proposed in the Notice would only undermine and delay the competitive promise of the Act by perpetuating "balkanized enclaves" of services,[15] without advancing any apparent consumer privacy interests.

Nonetheless, a number of parties oppose any expansive interpretation of "telecommunications service" as used in Section 222(c)(1). They contend that a narrow interpretation, such as that proposed by the Commission (Notice ¶ 22), is necessary to protect consumer privacy, as well as to guard against competitive abuses, particularly by incumbent LECs who have access to customer information, not as a result of winning customers in a competitive market, but solely as a result of their privileged monopoly

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[15] BellSouth at 7.

status.[16] None of these parties, however, demonstrates that consumers' privacy interests would in any way be compromised by allowing the broad use of CPNI within a firm without customer approval.[17] Accordingly, they provide the Commission, in construing Section 222 of the Act, no basis to depart from its longstanding and unequivocal position that customers' privacy interests are not compromised by internal use of customer information and that such use promotes consumer welfare.[18]

The Commission should continue to adhere to its prior express findings that broad use of CPNI within a

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[16] See, e.g., CompTel at 4-5; LDDS at 4, 8; Sprint at 3; TRA at 15; Texas PUC at 8.

[17] While concerns with a monopoly carrier's misuse of customer information are more significant, even those do not warrant restrictive interpretation of the term "telecommunications service" and sharp limitations on the use of CPNI within an integrated, competitive firm. Rather, the RBOCs' and GTE's protestations notwithstanding, the Commission retains the authority to maintain the existing Computer II and Computer III requirements as to these dominant carriers to the extent necessary to protect against competitive abuses. See AT&T at 4; CompTel at 8 n.6, 9; Excel at 6; MCI at 18-20; Sprint at 7; TRA at 17; WUTC at 10. This approach will also avoid the need for the Commission to revisit the meaning of the Act as the market evolves (Notice ¶ 23) and allow it to lift interim regulatory restraints at the appropriate time. As AT&T (at 4 n.3) showed, however, and as LDDS (at 12) confirms, AT&T should not be subject to the Computer Inquiry CPNI rules. As the Commission correctly recognizes (Notice ¶¶ 3, 4), enforcing these regulatory CPNI requirements for AT&T is altogether unnecessary because, as a nondominant carrier, AT&T could not "use CPNI obtained from [the] provision of regulated services to gain an anticompetitive advantage in the unregulated CPE and enhanced services markets."

[18] U S WEST at Appendix A, cataloging a number of FCC cases that address this issue.

single integrated firm does not raise significant privacy concerns,[19] and consumers would not object to having their CPNI disclosed within a firm to increase the competitive offerings made to them.[20] To the contrary, as the Commission has determined, privacy rights are not adversely affected when a customer receives a marketing contact from a firm with whom it has an established business relationship.[21] Rather, in an established business relationship the customer may be deemed to have permitted or invited use of information to offer new services to that customer.[22] There is little doubt that a broad construction of "telecommunications service" will permit carriers to most efficiently meet customer needs, without compromising consumer privacy.[23]

In short, the Commission should interpret the term "telecommunications service," as used in Section 222(c)(1), broadly to include, at a minimum, all services that the Commission has classified as "basic," or more expansively to include associated enhanced services and CPE that are needed

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19 Computer III Remand Order, 6 FCC Rcd. at 7611 n.159.

20 Amendment to Sections 64.702 of the Commission's Rules and Regulations (Third Computer Inquiry), 3 FCC Rcd. 1150, 1163 (1988) ("Computer III Reconsideration Order").

21 The Telephone Consumer Protection Act of 1991, 7 FCC Rcd. 2736, 2738 (1992). Accord AT&T at 8-9; SBC at 8-9, 10 n.9; GTE at 8; U S WEST at 16 n.41.

22 AT&T at 8-9; BellSouth at 3; GTE at 8; U S WEST at 16-17.

23 AT&T at 9; Bell Atlantic at 7; SBC at 7; U S WEST at 11; USTA at 4.

to fulfill a customer's telecommunications needs. A broad flexible interpretation of the Act would maximize consumer benefits by permitting carriers efficiently to use CPNI to develop and market other new telecommunications offerings, without impairing any reasonable privacy interest that a consumer may have in such information.

II. THE COMMISSION SHOULD DETERMINE THAT CUSTOMER APPROVAL TO USE CPNI FOR THE MARKETING OF NON-TELECOMMUNICATIONS SERVICES AND PRODUCTS EXISTS BY VIRTUE OF THE CUSTOMER'S INFORMED PARTICIPATION IN THE CUSTOMER-CARRIER RELATIONSHIP.

As a number of commenters point out, existing FCC policy is that, in general, CPNI should be available to all of a firm's marketing personnel absent customer direction to the contrary.[24] This policy is grounded in the Commission's well-reasoned conclusion that customers' expectations of privacy could be met without a notification obligation or a prior authorization requirement for internal carrier use of residential and small business customers' CPNI to market non-telecommunications services.[25] Rather, the Commission determined that customers want the convenience and efficiencies of "one-stop shopping" and all of the benefits of integrated marketing of basic and enhanced services. Indeed, the Commission expressly found that a prior

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[24] AT&T at 12-13; Bell Atlantic at 7-8; BellSouth at 13-14; U S WEST at 17.

[25] Computer III Remand Order, 6 FCC Rcd. at 7610-11; Amendment of Section 64.702 of the Commission's Rules and Regulations (Third Computer Inquiry), 2 FCC Rcd. 3035, 3096 (1987).

authorization requirement would, as a practical matter, deny to all but the largest business customers the benefits of "one-stop shopping" and integrated marketing because "a large majority of mass market customers are likely to have their CPNI restricted through inaction."[26] It further concluded that "a prior authorization rule would vitiate a [carrier's] ability to achieve efficiencies through integrated marketing to smaller customers -- one of the benefits sought through adoption of nonstructural safeguards rather than structural separation."[27]

These pronouncements should guide the Commission in determining the type of customer "approval" Section 222(c)(1) of the 1996 Act requires carriers to obtain to use CPNI for other than "telecommunications service." Many commenters agree that, consistent with the language of the Act and consumer interests as articulated in prior FCC rulings, the Commission should interpret the term "approval," as used in Section 222(c)(1), as having been provided by the customer to the carrier for all internal uses of CPNI based on the customer's informed participation in the customer-carrier relationship. Thus, following notification of CPNI rights and absent customer direction to the contrary, carriers would be permitted to use CPNI for

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[26] Computer III Remand Order, 6 FCC Rcd. at 7610 n.155.

[27] Id.

the development and marketing of non-telecommunications services and products offered by the integrated entity.[28]

In particular, many parties support AT&T's proposal that the Commission should require carriers to provide a one-time notification to all customers, with a negative "opt-out." As BellSouth explains (at 19), a negative opt-out approach is most consistent with Congress' use of the term "approval" in Section 222(c)(1), as contrasted with the "affirmative written" authorization required under (c)(2) when a customer wishes to direct a carrier to disclose his or her CPNI to a third party. More burdensome requirements are not contemplated under the Act for internal use of CPNI, and would only deny customers the benefits of technological advances and the other benefits of "one-stop shopping."[29] As GTE (at 5-6) explains:

> "[A]n approval mechanism that requires customers to affirmatively consent to marketing in writing would result in carriers being unable to market to a large number of customers who have no objection to use of their CPNI . . . but simply cannot be bothered by signing and returning a postcard."[30]

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[28] AT&T at 13-15; Ameritech at 9; Bell Atlantic at 8; BellSouth at 18; Pacific at 7, 10; SBC at 10-11; U S WEST at 6, 17; ALLTEL at 5; CBT at 8; GTE at 6-8 (supporting a negative opt-out approach albeit erroneously labeling it "opt-in").

[29] NYNEX at 15-16; Pacific at 15-16; U S WEST at 19.

[30] A number of commenters support a prior affirmative written consent requirement before a carrier could use a customer's CPNI. See AirTouch at 6 (for LECs); Arch at 8; CompTel at 6-7; Frontier at 7; MCI at 8; CWI at 5; CPUC at 10; CompuServe at 3; CFA at 5; Excel at 4; IIAA at 5; LDDS at 9-10; MFS at 11; NARUC at 3; TRA at 16; TCG at 6, 7; Texas PUC at 8, 11; WUTC at 7-8. However, none of these parties demonstrates that such a requirement grants customers better "control" of their CPNI than a

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Thus, as the Commission has recognized, a negative opt-out approach, which places the responsibility on the customer to direct that CPNI not be used (rather than on the carrier to obtain consent for use), is far preferable to obtaining positive customer consent.[31] The "opt-out" approach is not only substantially more cost-effective and avoids the very real potential that a carrier's ability to use CPNI would be inadvertently restricted through customer inaction, but it also maximizes consumer benefits from the development of innovative new products and services and the availability of increased information about those services. Furthermore, marketplace forces provide competitive telecommunications firms with the proper incentives to use customer information in a responsible manner, thus making the imposition of more onerous consent requirements superfluous.[32]

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notice and opt-out approach. A prior authorization requirement, moreover, is based on the unsupported premise (which is, indeed, contradicted by evidence of record) that customers do not want carriers to use their CPNI to better serve them.

[31] Computer III Reconsideration Order, 3 FCC Rcd. at 1163 ("Another advantage of the existing CPNI rule for enhanced services is that it places the burden of responding to the . . . CPNI notice on what will probably be the minority, rather than the majority of users.")

[32] AT&T at 15; Pacific at 6; GTE at 17. Nonetheless, AT&T recognizes that incumbent LECs are not subject to the same competitive marketplace forces that constrain the use of customer information by all other carriers. Thus, the Commission could require them to obtain consent in a form different from that required for other carriers. In any case, the Commission's tentative conclusion (Notice ¶ 36) that it need not specify the safeguards that

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There is also broad support for the notion that a one-time notice for existing customers, rather than a periodic notice, is adequate. As one commenter points out, "[r]epetitive mailings from . . . [a] multiplicity of carriers will be confusing and irritating for customers, costly for carriers, and unlikely to produce marginal benefit from one year to the next."[33] For new customers, the notice could be obtained at sign-up,[34] in the welcome package or the initial bill, or at whatever time the carrier intends to use CPNI in a circumstance when "approval" would be required.

In all events, many commenters confirm that carriers should be permitted the flexibility to provide notice verbally and simultaneously with a carrier's attempt to seek approval for use of CPNI, as well as in advance of

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carriers should include in their internal data bases and systems to protect customer-restricted CPNI is sound. Carriers are in the best position to determine and develop the most efficient means of protecting such information. AT&T at 15 n.19; CBT at 10-11.

[33] BellSouth at 17, citing Privacy and the NII: Safeguarding Telecommunications-Related Personal Information, U.S. Department of Commerce, National Telecommunications and Information Administration (October 1995) at n.89; see also Bell Atlantic at 3, 10-11; U S WEST at 18 n.46.

[34] As a number of parties show, Section 222(d) expressly allows carriers to disclose customer information to another carrier that "wins" the customer so that the latter can "initiate" service to the customer. AT&T at 17-18; Sprint at 5; NYNEX at 12 n.15; Pacific at 4-5.

such use, either verbally or in writing.[35] As BellSouth explains (at 22), carriers "are accustomed to conducting business orally . . . and to document in company systems a variety of customer communications." Of course, once approval is granted (or denied), such approval (or denial) should govern until the customer designates otherwise, consistent with prior Commission rulings.[36]

CONCLUSION

The Commission should adopt the interpretations of Section 222 of the 1996 Act described herein and in AT&T's initial comments, so as to allow consumers to reap the benefits of "one-stop shopping" and integrated marketing, while preserving their legitimate privacy interests.

Respectfully submitted,

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[35] AT&T at 16; MCI at 9-11; Sprint at 5; Ameritech at 8, 11; Bell Atlantic at 9; BellSouth at 16-17; CBT at 8; NYNEX at 14; Pacific at 5; SBC at 12; U S WEST at 17.

[36] AT&T at 16; MCI at 12; Ameritech at 11; Arch at 12; CBT at 8; MCI at 12. See also Computer III Reconsideration Order, 3 FCC Rcd. at 1164 (Similarly, "a customer's election to restrict its CPNI should remain valid unless and until the customer specifically revokes that choice. This will ease the administrative burden and the risk of 'authorization by oversight' . . . .").

LIST OF COMMENTERS
CC Docket 96-115

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American Public Communications Council ("APCC")

America's Carrier Telecommunications Association ("ACTA")

Ameritech

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AT&T Corp. ("AT&T")

Bell Atlantic

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GTE Service Corporation ("GTE")

Information Technology Association of America ("ITAA")

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MFS Communications Company, Inc. ("MFS")

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NYNEX Telephone Companies ("NYNEX")

Pacific Telesis Group ("Pacific")

Paging Network, Inc. ("PageNet")

Pennsylvania Office of Consumer Advocate ("PaOCA")

Personal Communications Industry Association ("PCIA")

SBC Communications Inc. ("SBC")

Small Business in Telecommunications, Inc. ("SBT")

Sprint Corporation ("Sprint")

Telecommunications Resellers Association ("TRA")

Teleport Communications Group, Inc. ("TCG")

Texas Public Utility Commission ("Texas PUC")

United States Telephone Association ("USTA")

U S WEST, Inc. ("U S WEST")

Virgin Islands Telephone Corporation ("Vitelco")

Washington Utilities & Transportation Commission ("WUTC")

Yellow Pages Publishers Association ("YPPA")

CERTIFICATE OF SERVICE

I, Diane Danyo, do hereby certify that a true copy of the foregoing Reply Comments of AT&T Corp. was served this 26th day of June, 1996, by United States mail, first class, postage prepaid, upon the parties listed on the attached Service List.

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